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Ref: 10CFR50.54(f)

CPSES- 200500457
Log # TXX-05056

March 7, 2005

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
REQUEST FOR ADDITIONAL INFORMATION FOR RESPONSE TO NRC BULLETIN 2004-01, "INSPECTION OF ALLOY 82/182/600 MATERIALS USED IN THE FABRICATION OF PRESSURIZER PENETRATIONS AND STEAM SPACE PIPING CONNECTIONS AT PRESSURIZED WATER REACTORS"

REF: 1. NRC Bulletin 2004-01 "Inspection of Alloy 82/182/600 Materials Used in the Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized Water Reactors," dated May 28, 2004

2. Letter logged TXX-04140 dated October 1, 2004 from Mike Blevins of TXU Power to the NRC.

Gentlemen:

Attached is the response to the Request for Additional Information regarding the response for Comanche Peak Units 1 and 2 to NRC Bulletin 2004-01, reference 2. The Bulletin advised pressurized water reactor (PWR) addressees that current methods of inspecting Alloy 82/182/600 materials used in the fabrication of pressurizer penetrations and steam space piping connections may need to be supplemented with additional measures to detect and adequately characterize flaws due to primary water stress corrosion.

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This communication contains the following new licensing basis commitment regarding CPSES Units 1 and 2.

	Description of Commitment
27334	TXU Power will notify the NRC upon defining a flaw as circumferential cracking in an alloy 82/182 reactor coolant system piping attachment weld.

Should you have any questions, please contact Mr. J. D. Seawright at (254) 897-0140.

I state under penalty of perjury that the foregoing is true and correct.

Executed on March 7, 2005

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

Mike Blevins

By: Rafael Flores
Rafael Flores
Vice President, Nuclear Operations

JDS
Attachment

c - B. S. Mallett, Region IV
W. D. Johnson, Region IV
M. C. Thadani, NRR
Resident Inspectors, CPSES

Request for Additional Information regarding NRC Bulletin 2004-01, "Inspection of Alloy 82/182/600 Materials Used in The Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized-water Reactors."

The NRC staff has reviewed the response, dated July 27, 2004, from Comanche Peak Steam Electric Station, Units 1 and 2 to NRC Bulletin 2004-01, "Inspection of Alloy 82/182/600 Materials Used in The Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized-water Reactors." Based on the staff's review we have determined that some additional information is required to complete our review of your response. If you feel that it is necessary, we can arrange a phone call with your staff to discuss this request for additional information. The plant has a spring 2005 outage and we must have all questions resolved and have received their supplemental response well before the plant enters this outage so that we can complete the review before the outage commences. The request for additional information is presented below:

NRC Requested Information 1

Your response to Bulletin 2004-01 Question (1)(c) did not clearly communicate your intentions with respect to establishing a voluntary dialogue with Nuclear Regulatory Commission (NRC) technical staff in the event that circumferential primary water stress corrosion cracking (PWSCC) is identified at any locations covered under the scope of Bulletin 2004-01. The NRC staff addressed this issue, in part, on page 5 of Bulletin 2004-01 stating, ". . . the NRC staff believes that the topic of NDE scope expansion should be discussed with the NRC if circumferential PWSCC is observed in either the pressure boundary or non-pressure boundary portions of any locations covered under the scope of this bulletin to ensure that the licensee has performed an adequate extent-of-condition evaluation."

Please clarify your intentions in this regard. You may wish to consider that other similarly situated licensees have included a statement in their bulletin response like the following:

"If circumferential cracking is observed in either the pressure boundary or non-pressure boundary portions of any locations covered under the scope of this bulletin, [we] will develop plans to perform an adequate extent-of-condition evaluation and [we] will discuss those plans with cognizant NRC technical staff prior to restarting the affected unit."

TXU Power Response 1:

CPSES management recognizes the importance of fully investigating any discovered condition including circumferential primary water stress corrosion cracking (PWSCC). Investigating the extent of condition within the relevant population is, as well, fully understood by CPSES management. CPSES personnel continue to exercise leadership in industry activities targeted at

addressing all aspects of the challenges presented by the use of Alloy 82/182/600 materials within the PWR fleet. Consequently, the necessity for and value of reviewing inspection findings indicative of PWSCC with other industry peers as well as the NRC is similarly well understood by CPSES senior management. CPSES maintains frank, open communications with the NRC on all matters of regulatory significance and clearly the discovery of a PWSCC-related circumferential crack would be treated no differently. TXU Power will notify the NRC upon defining a flaw as circumferential cracking in an Alloy 82/182 reactor coolant system piping attachment weld.

NRC Requested Information 2

Bulletin 2004-01 considers all pressurizer penetrations and steam space connections at your plant, whether, pressure boundary or non-pressure boundary to be under the scope of this bulletin. Tables 2 and 3 of CPSES response to Bulletin 2004-01 state, "Non-pressure boundary seal weld," for the material of Component 7 in these Tables. This does not adequately describe the materials of construction of this component. Please explain how CPSES can determine whether or not to inspect this component if the weld material is not stated in the bulletin response.

TXU Power Response 2:

The CPSES pressurizer is internally clad with weld deposited stainless steel including the locations of the instrument connections described as Component 7 in Table 2 & 3 of our response in Reference 2. The rolled joint is considered the ASME Code pressure boundary which is supplemented by a non-pressure boundary seal weld joining the stainless steel cladding to the stainless steel instrument nozzle tubing. This is therefore a stainless steel seal weld and does not contain any Alloy 82/182/600 materials.